UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:) Chapter 11
MINING PROJECT WIND DOWN HOLDINGS, INC. (f/k/a Compute North Holdings, Inc.), <i>et al.</i> , ¹) Case No. 22-90273 (MI)
Debtors.) (Jointly Administered)

CERTIFICATE OF NO OBJECTION WITH RESPECT TO PORTAGE POINT PARTNERS, LLC'S SECOND INTERIM AND FINAL FEE APPLICATION

Pursuant to the Procedures for Complex Chapter 11 Cases in the Southern District of Texas, the undersigned representatives of Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) and its affiliates (collectively, the "<u>Debtors</u>") certify as follows:

- 1. On May 15, 2023, Portage Point Partners, LLC ("Portage Point") filed its Second Interim and Final Fee Application of Portage Point Partners, LLC for Compensation for Services Rendered and Reimbursement of Expenses as Financial Advisor for the Debtors and Debtors in Possession, for the Period from September 22, 2022 Through March 31, 2023 (the "Application") [Docket No. 1130].
- 2. The deadline for parties to file responses to the relief requested in the Application was June 5, 2023 (the "Objection Deadline"). More than 24 hours have passed since the Objection Deadline. Counsel for the Debtors has reviewed the Court's docket and no objection/response to

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); and Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551). The Debtors' service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

the relief requested in the Application appears thereon. Counsel for the Debtors has not received any objection or response to the Application, and represents to the Court that Portage Point is not aware of any such objection or response.

3. Attached hereto is a proposed form of order granting the relief requested in the Application (the "<u>Proposed Order</u>"). Also attached hereto is a redline of the Proposed Order reflecting non-substantive changes between the Proposed Order and the previously filed proposed order.

WHEREFORE, the applicant respectfully requests that the Court enter the Proposed Order, granting the relief requested in the Application, and granting such other and further relief as the Court may deem proper.

[Remainder of Page Intentionally Left Blank]

Respectfully submitted,

Dated: June 9, 2023

Houston, Texas

/s/ James T. Grogan III

PAUL HASTINGS LLP

James T. Grogan III (TX Bar No. 24027354)

600 Travis Street, 58th Floor

Houston, Texas 77002 Telephone: (713) 860-7300 Facsimile: (713) 353-3100

Email: jamesgrogan@paulhastings.com

-and-

Luc Despins (admitted *pro hac vice*)

Sayan Bhattacharyya(admitted pro hac vice)

Daniel Ginsberg (admitted pro hac vice)

200 Park Avenue

New York, New York 10166 Telephone: (212) 318-6000 Facsimile: (212) 319-4090

Email: lucdespins@paulhastings.com

sayanbhattacharyya@paulhastings.com danielginsberg@paulhastings.com

-and-

Matthew Micheli (admitted *pro hac vice*) Michael Jones (admitted *pro hac vice*) 71 South Wacker Drive, Suite 4500

Chicago, Illinois 60606 Telephone: (312) 499-6000 Facsimile: (312) 499-6100

Email: mattmicheli@paulhastings.com michaeljones@paulhastings.com

Counsel to the Debtors and Debtors in Possession